

CALIFORNIA COASTAL COMMISSION

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY
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May 17, 2024

Jodi Clifford
Chief, Planning Division
U.S. Army Corps of Engineers, Los Angeles District
915 Wilshire Boulevard, Suite 1109
Los Angeles, CA 90017-3409

Re: Consistency Determination CD-0001-24, (Six-Year Maintenance Dredging Program for Channel Islands Harbor and Port Hueneme)

Dear Chief Clifford,

On May 10, 2024, the California Coastal Commission conditionally concurred with the above-referenced consistency determination submitted by the United States Army Corps of Engineers (Corps), for a six-year maintenance dredging program for Channel Islands Harbor and Port Hueneme Harbor, with 8.25 million cubic yards of dredging, and beach placement at Silver Strand Beach, Hueneme Beach, and a nearshore placement site offshore of Hueneme Beach, Ventura County.

Below is the condition for consistency determination CD-0001-24:

- 1. Revised Habitat Mitigation and Monitoring Plan.** WITHIN SIX MONTHS OF COMMISSION CONCURRENCE WITH THE USACE CONSISTENCY DETERMINATION, USACE shall provide a revised final version of the Draft *Hollywood Beach Western Showy Plover Habitat Expansion and Enhancement Plan* (Plan) dated March 2024, to the Commission's Executive Director for review. The Corps will carefully consider all comments by the Commission's Executive Director and will make all reasonable efforts to ensure that the concerns expressed are resolved and any necessary revisions are incorporated into the Plan. The revised Plan shall include, but not be limited to the following:
 - A post-project quantification of the permanent adverse impacts to the coastal strand and southern foredune Environmentally Sensitive Habitat Areas (ESHA) as a result of each dredging event and confirmation that the mitigation acreage proposed in the Plan is sufficient to meet the required mitigation ratio for the adverse impacts to ESHA of at least 3:1. If an impact occurs during any given dredge event then future impacts within that same footprint will not be considered a new impact in subsequent cycles, and once mitigated it will be considered fully mitigated and not subject to future mitigation.
 - A timeline for implementation of the Plan by the end of 2025 and information on how the mitigation ratio(s) could be modified to account for temporal lag in the event that project implementation is significantly delayed.

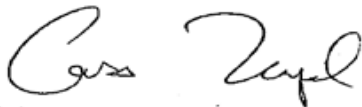
- Revised dune expansion/creation and enhancement methods to include the following:
 - Dune recontouring shall only occur in dune areas highly invaded by European beach grass (*Ammophila arenaria*) and highway iceplant (*Carpobrotus edulis*) such that they have attained abnormal heights. In these areas the focus shall be on achieving a back dune slope of 3:1 or less, as opposed to targeting a height of not more than six feet. Excess sand resulting from dune recontouring will be used in dune expansion.
 - Provision of an Integrated Pest Management Plan that describes the steps and details required to eliminate and remove invasive plant species through hand and mechanical removal, horizon flipping in consultation with United States Fish and Wildlife Service (USFWS), and, if necessary, pesticide (herbicide) application. For areas where hand and mechanical methods are not practical such as where the invasive European beach grass and highway iceplant are widespread and well established, **chemical treatment will employ the appropriate glyphosate formula and with surfactants (adjuvants)** considered to be the least toxic appropriate for the target species, and constituting the least environmentally damaging alternative. If chemical treatment is deemed to be necessary, a California licensed Pest Control Advisor (PCA) must provide written recommendations regarding the appropriate herbicides and adjuvants for the respective circumstances and species. The product registration number(s) should be provided along with a complete description of how they will be used, including criteria and limits for if/when/how (including frequency and total number of applications), precautions that would be taken for sensitive species (e.g., buffers) and potential runoff, and triggers for adaptive management or remedial actions. In no instance shall spray herbicide application occur if wind speeds on site are greater than 5 mph or 48 hours prior to predicted rain. In the event that rain does occur, herbicide application shall not resume again until 72 hours after rain. Herbicide applications during the rainy season shall be timed to avoid rainfall events. For all work involving chemical applications, a PCA or Qualified Licensed Applicator (QLA) must be on site.
 - Dead invasive plant material that is not left to decompose in place (e.g. highway iceplant) must be transported to a land fill. No invasive plant material shall be buried in the beach below the waterline.
 - Application of erosion control BMPs in areas where invasive species are removed until dune recontouring and planting with native species can take place.
 - Dune expansion Plans including maps/exhibits of the proposed expansion area, methods for sand retention (e.g. sand fencing, sterile hay plugs, etc.), plant palette, source of plant material (seeds and seedlings), maintenance activities, signage, public access routes, etc.
 - Monitoring program that includes the sampling design (schedule and type of qualitative and quantitative monitoring), a map depicting sampling design elements (e.g. permanent photo points and transects or quadrats), annual and final success criteria based on reference sites or the peer-reviewed literature, and statistical basis for judging success.

- In addition to the six-year final monitoring report, annual monitoring reports shall be submitted to USFWS and the Executive Director for review. Annual monitoring reports shall include: an assessment of dune and western snowy plover habitat conditions and issues such as trash, erosion, invasive vegetation, or pests; a general description of the dune morphologic and vegetation conditions along with photos from permanent photo points strategically located and mapped on an exhibit in the final plan depicting the sampling design; a determination as to whether the dunes have met that annual success criteria; and whether the dunes are expected to meet Year six success criteria.
- Objective performance standards that will allow future assessment of the success of the habitat expansion and enhancement, along with detailed criteria for development and implementation of any adaptive management strategies determined to be necessary if the habitat is not meeting performance standards. Implementation of any adaptive management strategies would require prior review of the Executive Director.

The Commission determined that, only as conditioned, could the project be found consistent to the maximum extent practicable with the enforceable policies of the California Coastal Management Program. The Commission notes that as provided in 15 CFR § 930.4(b), should the Corps not agree with the Commission's condition of concurrence, then all parties shall treat this conditional concurrence as an objection.

If you have questions, please feel free to contact Wesley Horn at Wesley.Horn@coastal.ca.gov.

Sincerely,



Cassidy Teufel
Director
Energy, Ocean Resources, Federal Consistency, and Technical Services

CC

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